

1 WRIGHT, FINLAY & ZAK, LLP  
2 Christina V. Miller, Esq.  
3 Nevada Bar No. 12448  
4 Ramir M. Hernandez, Esq.  
5 Nevada Bar No. 13146  
6 7785 W. Sahara Avenue, Suite 200  
7 Las Vegas, Nevada 89117  
8 (702) 475-7964; Fax: (702) 946-1345  
9 [rherandez@wrightlegal.net](mailto:rherandez@wrightlegal.net)  
10 *Attorneys for Defendant, Flagstar Bank, FSB*

11  
12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 SHAWNAE DOWE,

15 Plaintiff,

16 vs.

17 EQUIFAX INFORMATION SERVICES LLC;  
18 EXPERIAN INFORMATION SOLUTIONS,  
19 INC.; FLAGSTAR BANK; and SYNCHRONY  
20 FINANCIAL dba SYNCB/CARE CREDIT,

21 Defendants.

Case No.: 2:21-cv-01751-JCM-EJY

22 **JOINT MOTION TO EXTEND**  
23 **DEADLINE TO RESPOND TO**  
24 **PLAINTIFF’S COMPLAINT (FIRST**  
25 **REQUEST)**

26 Plaintiff, Shawnae M. Dowe (“Plaintiff”), and Defendant, Flagstar Bank, FSB. (“Flagstar”)  
27 (collectively the “Parties”), by and through their counsel of record, hereby stipulate and agree as  
28 follows:

On September 22, 2021, Plaintiff filed the Complaint [ECF No. 1]. Flagstar was served with Plaintiff’s Complaint on September 30, 2021. As such, Flagstar’s deadline to respond to the Complaint is October 21, 2021. The Parties have discussed extending the deadline for Flagstar to respond to Plaintiff’s Complaint by an additional thirty days to allow for better investigation of the allegations against Flagstar.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Flagstar to file its responsive pleading to Plaintiff’s Complaint to November 19, 2021.

This is the first stipulation for extension of time for Flagstar to file its responsive pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to any other party.

1 As part of this stipulation, Flagstar agrees to participate in any Rule 26(f) conference that  
2 occurs during the pendency of this extension.

3 DATED this 18th day of October, 2021.

4  
5 WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM, LLC

6 /s/ Ramir M. Hernandez, Esq.

/s/ George Haines, Esq.

7 Christina V. Miller, Esq.

George Haines, Esq.

8 Nevada Bar No. 12248

Nevada Bar No. 9411

9 Ramir M. Hernandez, Esq.

Gerardo Avalos

10 Nevada Bar No. 13146

Nevada Bar No. 15171

7785 W. Sahara Ave., Suite 200

8985 South Eastern Ave., Suite 350

Las Vegas, NV 89117

Las Vegas, NV 89123

*Attorneys for Defendant, Flagstar Bank, FSB*

*Attorneys for Plaintiff, Shawnae M. Dowe*

11  
12  
13  
14 IT IS SO ORDERED:

15   
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: October 18, 2021